REMARKS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claim 78 has been added. Claims 1-58 have been cancelled. Claims 59, 60, 68, 69, and 77 have been amended. Claims 59-78 are pending in the Application.

I.   Rejection of Claims 40-46, 49-54, and 57-58 Under 35 U.S.C. § 102(a)

In the Office Action, claims 40-46, 49-54, and 57-58 were rejected under 35 U.S.C. § 102(a) as being anticipated by Kraft. Claims 1-58 have been cancelled rendering all of these rejections moot.

II.   Rejection of Claims 47 and 55 Under 35 U.S.C. § 103(a)

In the Office Action, claims 47 and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and further in view of Dunsmoir. Claims 1-58 have been cancelled rendering all of these rejections moot.

III.   Rejection of Claims 48 and 56 Under 35 U.S.C. § 103(a)

In the Office Action, claims 48 and 56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and further in view of Biliris. Claims 1-58 have been cancelled rendering all of these rejections moot.

IV.   Rejection of Claims 59-63, 65-72, and 74-77 Under 35 U.S.C. § 103(a)

In the Office Action, claims 59-63, 65-72, and 74-77 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and further in view of Dunsmoir. Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. At a minimum, the Examiner has failed to demonstrate that Kraft and Dunsmoir in combination disclose, teach, or suggest all of the claim limitations as recited in claims 59-63, 65-72, and 74-77.

Claim 59 recites:

> editing the template using a copy of the page layout application, the copy executing at the server;
>
> selecting a data item from the plurality of data items stored at the server; and
>
> populating the changeable field of the template with the selected data item thereby generating the custom document at the server

Claims 68 and 77 recite:

> provide editing of the template using a copy of the page layout application, the copy executing at a server;
>
> allow a user to select a data item from the plurality of stored data items; and
>
> populating the changeable field of the template with the selected data item thereby generating the custom document

On pages 8-9 of the Office Action dated 10/18/2005, the Examiner states:

> Regarding independent claim 59, ... Kraft does not disclose:
>
> - editing the template using the application, the application executing at the server (col 5, lines 58-67) It would have been obvious to one of ordinary skill in the art at the time of the invention was made to have combined Dunsmoir into Kraft since Dunsmoir discloses modifying the template at the server providing the advantage to incorporate into Kraft for desirably changing the form structure in Kraft, which is a template, when said form is submitted to the server.

On page 11 of the Office Action dated 10/18/2005, the Examiner further states:

> Claims 68-72, 74-76 are for a computer program product of method claims 59-63, 65-67, respectively, and are rejected under the same rationale.
>
> Claim 77 is for a system of method claim 59, and is rejected under the same rationale.

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Applicants respectfully disagree.

Kraft discloses "a graphical user interface (GUI) to assist a user in completing electronic forms." (Abstract). The GUI presents the user with a predetermined list of fields with which the user can populate the electronic form. Specifically, the "user selects a desired menu entry from a list of available menu entries, and then enters the appropriate data within the data field corresponding to the menu entry selected." (Col. 1, line 66 – Col. 2, line 2; emphasis added). Thus, Kraft discloses an application that allows a user to create a page by entering data into predefined fields of a template. Kraft further discloses "the user accesses the menu field and selects one or more of the menu entries corresponding to the information the user wishes to enter. ... the user accesses the data field within the row entry template and enter [sic] data therein." (Kraft, Col. 5, lines 17-32). Thus, Kraft discloses an application that allows a user to create a page by entering data into predefined fields of a template. However, this is not what Applicants are claiming. Applicants claim "editing the template using a copy of the page layout application, the copy executing at the server." (Claim 59; emphasis added). Kraft fails to teach, suggest, or describe at least "editing the template using a copy of the page layout application, the copy executing at the server" as required by claims 59, 68, and 77.

Dunsmoir describes "an enhanced caching and mirroring router which modifies stored web pages in order to indicate the age, time of capture." (Abstract). In describing the router, Dunsmoir states "the caching engine (11) uses the Boson servlet (23) to merge a marking template (25) with the cached page copy (24). Table 1 shows an example of an HTML template which could be used as the marking template." (Col. 4, lines 29-33). Dunsmoir further describes "Boson is passed this template ..., and it is passed the parameter string (25) .... Then, it merges the two to create a new HTML output (26) as shown in Table 3." (Col. 4, lines 67-71). Table 1 of Dunsmoir shows an example of an HTML template which could be used as the marking template. Dunsmoir does not describe editing the HTML template at all. Thus, Dunsmoir describes use of a template in creating a modified HTML file (*See* Dunsmoir, Table 3) and does not describe designing the template or defining the fields in the template at all. As a result, similar to the Kraft reference, Dunsmoir relates to a system of populating predefined fields of a

template. More specifically, Dunsmoir discloses a method for merging timing information into a web page such that an end viewer can determine when the web page was retrieved. Dunsmoir does not describe editing the HTML template at all. Therefore, Dunsmoir fails to teach, suggest, or describe at least "editing the template using a copy of the page layout application, the copy executing at the server" as required by claims 59, 68, and 77.

Biliris describes "a messaging system ..., which supports combinations of directory and mailing list addressing mechanisms." (Abstract). Examiner cites Biliris as disclosing creation of a mailing list. Biliris fails to teach, suggest, or describe at least "editing the template using a copy of the page layout application, the copy executing at the server" as required by claims 59, 68, and 77.

Thus, none of Kraft, Dunsmoir, or Biliris describe, suggest, or teach all of the limitations of claims 59, 68, and 77. An obviousness rejection cannot properly be maintained where the references used in the rejection do not disclose all of the recited claim elements. Therefore, Applicants respectfully request withdrawal of the rejection of claims 59, 68, and 77. Applicants respectfully traverse any arguments posed by Examiner relative to claims 60-67, 69-77, and 78 as they are allowable for at least the reasons outlined above relative to claims 59, 68, and 77. Therefore, Applicants respectfully request withdrawal of the rejection of claims 59-78.

V.   Rejection of Claims 64 and 73 Under 35 U.S.C. § 103(a)

In the Office Action, claims 64 and 73 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Kraft and Dunsmoir and further in view of Biliris. Applicants respectfully traverse this rejection because the Examiner has failed to present a prima facie case of obviousness. As discussed in Section IV. above, Kraft, Dunsmoir, and Biliris fail to teach all of the limitations of claims 59 and 68. Therefore, Applicants respectfully request withdrawal of the rejection of claims 64 and 73 which depend from claims 59 and 68, respectively.
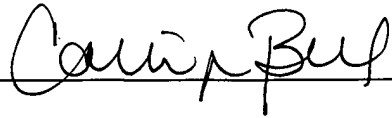
Applicants respectfully submit that each and every outstanding objection and rejection of the pending claims has been overcome and that the Application is in condition for allowance. As a result, Applicants respectfully request reconsideration and allowance of pending Claims 59-78.

The Examiner is encouraged to contact the undersigned by telephone if the Examiner believes that a telephone interview would advance the prosecution of the present Application.

Respectfully submitted,

Dated: <u>April 18, 2006</u>　　　　　　　By _____

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